

Remarks

The Office Action mailed October 2, 2006 and the Notice of Non-Compliant Amendment mailed March 8, 2007 have been carefully reviewed and the following remarks are submitted in consequence thereof.

Claims 1-64 are pending in this application. Claims 1-64 stand rejected.

In response to the Notice of Non-Compliant Amendment mailed March 8, 2007, Applicants have renumbered Claim 65 as Claim 64. Accordingly, Applicants submit that this response is in compliance with 37 CFR 1.121.

In addition, Applicants have shown the Claim changes included in the prior Amendment submitted February 28, 2007.

Applicants note the request for corrected drawings in compliance with 37 CFR 1.121(d). Applicants submit that corrected formal drawings were submitted on August 9, 2001. Applicants have resubmitted the formal drawings herewith.

The rejection of Claims 1, 6-11, and 16-65 under 35 U.S.C. § 102(e) as being anticipated by Walter et al. (U.S. Patent No. 6,334,110) (hereinafter referred to as "Walter") is respectfully traversed.

Applicants respectfully submit that Walter does not describe nor suggest the claimed invention. As discussed below, Walter does not describe nor suggest a method for managing customer relationships between customers, a dealer, and a lender, wherein the dealer offers products for sale to the customers and the lender is engaged in a business of providing financing, wherein the method comprises the steps of providing a database of customer information, customer spending data, and customer financial data, wherein the financial data includes at least one of income, loan and credit payment history, and loan and credit overpayments; predicting future customer behavior based on the customer information, customer spending data, and customer financial data; and constructing customer campaigns with personalized offers for targeted customers, calculating for each customer at least one of an expected income from the customer for the dealer and a timing of purchase of a product from the dealer based on the predicted future customer behavior, and providing financing by

the lender for the dealer as part of the offer to targeted customers, wherein the lender provides financing to the targeted customers that purchase a product from the dealer as a result of the customer campaigns.

Specifically, Walter does not describe or teach a method including providing a database of customer information, customer spending data, and customer financial data, wherein the financial data includes at least one of income, loan and credit payment history, and loan and credit overpayments, and predicting future customer behavior based on the customer information, customer spending data, and customer financial data. Rather, Walter describes at Column 2, lines 27-30, a database including one profile per customer that represents “a complex time series object that captures the sequence of browsing and buying activity as well as the timestamp of each activity and the product being browsed or bought.” Specifically, Walter describes tracking products that a customer browses or purchases and tracking a timeframe of the browsing. More specifically, Walter performs a market analysis based on the products that a customer purchases and a timeframe within which the product is purchased. Accordingly, in contrast to the presently claimed invention, the market analysis is based on products and time of purchase, and is not based on customer financial data including at least one of income, loan and credit payment history, and loan and credit overpayments. Therefore, Walter does not describe nor teach providing a database of customer information, customer spending data, and customer financial data, wherein the financial data includes at least one of income, loan and credit payment history, and loan and credit overpayments, and predicting future customer behavior based on the customer information, customer spending data, and customer financial data. Applicants submit that by merely describing a database including information specific to product purchases and creating a market analysis therefrom does not describe nor teach a database including customer financial data including at least one of income, loan and credit payment history, and loan and credit overpayments, and predicting future customer behavior based on the customer information, customer spending data, and customer financial data.

Further, Walter does not describe or teach a method including calculating for each customer at least one of an expected income from the customer for the dealer and a timing of purchase of a product from the dealer based on the predicted future customer behavior, and providing financing by the lender for the dealer as part of the offer to targeted customers, wherein the lender provides financing to the targeted customers that purchase a product from

the dealer as a result of the customer campaigns. Rather, Walter describes at Column 2, lines 27-30, a database including one profile per customer that represents “a complex time series object that captures the sequence of browsing and buying activity as well as the timestamp of each activity and the product being browsed or bought.” Walter further describes at Column 2, lines 31-38, clustering the profiles into segments and using the segments “to develop segment-specific advertising campaigns”. Specifically, Walter describes developing advertising campaigns based on products that a customer browses or purchases and a timeframe of the browsing or purchase. Accordingly, in contrast to the presently claimed invention, the advertisement campaign is utilized to merely market particular products, and does not provide financing for predicted purchases. Therefore, Walter does not describe nor teach calculating for each customer at least one of an expected income from the customer for the dealer and a timing of purchase of a product from the dealer based on the predicted future customer behavior, and providing financing by the lender for the dealer as part of the offer to targeted customers, wherein the lender provides financing to the targeted customers that purchase a product from the dealer as a result of the customer campaigns. Applicants submit that by merely describing an advertisement campaign utilized to merely market particular products does not describe nor teach calculating for each customer at least one of an expected income from the customer for the dealer and a timing of purchase of a product from the dealer based on the predicted future customer behavior, and providing financing by the lender for the dealer as part of the offer to targeted customers, wherein the lender provides financing to the targeted customers that purchase a product from the dealer as a result of the customer campaigns.

Walter describes a system for analyzing customer behavior based on a time when the behavior occurs. Specifically, Walter describes a system that captures information about customer transactions over time, classifies the customers into clusters based on the transactions and the time of the transactions, and performs a market analysis based on the information and clusters. More specifically, at Column 2, lines 27-30, Walter describes creating a database including one profile per customer that represents “a complex time series object that captures the sequence of browsing and buying activity as well as the timestamp of each activity and the product being browsed or bought.” Accordingly, the system described in Walter tracks types of goods purchased by a customer and the timeframe in which the customer purchases the goods, and creates a market analysis based on the goods purchased and the timeframe of the purchase.

Notably, Walter does not describe nor suggest a method including calculating for each customer at least one of an expected income from the customer for the dealer and a timing of purchase of a product from the dealer based on the predicted future customer behavior, and providing financing by the lender for the dealer as part of the offer to targeted customers, wherein the lender provides financing to the targeted customers that purchase a product from the dealer as a result of the customer campaigns. Further, Walter does not describe nor suggest a method including calculating for each customer at least one of an expected income from the customer for the dealer and a timing of purchase of a product from the dealer based on the predicted future customer behavior, and providing financing by the lender for the dealer as part of the offer to targeted customers, wherein the lender provides financing to the targeted customers that purchase a product from the dealer as a result of the customer campaigns.

Claim 1 recites a method for managing customer relationships between customers, a dealer, and a lender, wherein the dealer offers products for sale to the customers and the lender is engaged in a business of providing financing, wherein the method comprises the steps of “providing a database of customer information, customer spending data, and customer financial data for each customer stored within the database, wherein the financial data includes at least one of income, loan and credit payment history, and loan and credit overpayments for each customer...predicting future customer behavior for each customer stored in the database based on the customer information, customer spending data, and customer financial data...calculating for each customer at least one of an expected income from the customer for the dealer and a timing of purchase of a product from the dealer based on the predicted future customer behavior...generating a list of targeted customers based on the calculated expected income and the calculated timing of purchase, wherein a targeted customer is a customer designated for receiving from the dealer a personalized offer for sale of a product...constructing customer campaigns with personalized offers for the targeted customers...providing financing by the lender for the dealer as part of the offer to the targeted customers, wherein the lender provides financing to the targeted customers that purchase a product from the dealer as a result of the customer campaigns.”

Walter does not describe nor suggest a method for managing customer relationships as recited in Claim 1. Specifically, Walter does not describe or teach a method including providing a database of customer information, customer spending data, and customer

financial data, wherein the financial data includes at least one of income, loan and credit payment history, and loan and credit overpayments, and predicting future customer behavior based on the customer information, customer spending data, and customer financial data. Rather, Walter describes at Column 2, lines 27-30, a database including one profile per customer that represents “a complex time series object that captures the sequence of browsing and buying activity as well as the timestamp of each activity and the product being browsed or bought.” Specifically, Walter describes tracking products that a customer browses or purchases and tracking a timeframe of the browsing. More specifically, Walter performs a market analysis based on the products that a customer purchases and a timeframe within which the product is purchased. Accordingly, in contrast to the presently claimed invention, the market analysis is based on products and time of purchase, and is not based on customer financial data including at least one of income, loan and credit payment history, and loan and credit overpayments. Therefore, Walter does not describe nor teach providing a database of customer information, customer spending data, and customer financial data, wherein the financial data includes at least one of income, loan and credit payment history, and loan and credit overpayments, and predicting future customer behavior based on the customer information, customer spending data, and customer financial data. Applicants submit that by merely describing a database including information specific to product purchases and creating a market analysis therefrom does not describe nor teach a database including customer financial data including at least one of income, loan and credit payment history, and loan and credit overpayments, and predicting future customer behavior based on the customer information, customer spending data, and customer financial data.

Further, Walter does not describe or teach a method including calculating for each customer at least one of an expected income from the customer for the dealer and a timing of purchase of a product from the dealer based on the predicted future customer behavior, and providing financing by the lender for the dealer as part of the offer to targeted customers, wherein the lender provides financing to the targeted customers that purchase a product from the dealer as a result of the customer campaigns. Rather, Walter describes at Column 2, lines 27-30, a database including one profile per customer that represents “a complex time series object that captures the sequence of browsing and buying activity as well as the timestamp of each activity and the product being browsed or bought.” Walter further describes at Column 2, lines 31-38, clustering the profiles into segments and using the segments “to develop segment-specific advertising campaigns”. Specifically, Walter describes developing

advertising campaigns based on products that a customer browses or purchases and a timeframe of the browsing or purchase. Accordingly, in contrast to the presently claimed invention, the advertisement campaign is utilized to merely market particular products, and does not provide financing for predicted purchases. Therefore, Walter does not describe nor teach calculating for each customer at least one of an expected income from the customer for the dealer and a timing of purchase of a product from the dealer based on the predicted future customer behavior, and providing financing by the lender for the dealer as part of the offer to targeted customers, wherein the lender provides financing to the targeted customers that purchase a product from the dealer as a result of the customer campaigns. Applicants submit that by merely describing an advertisement campaign utilized to merely market particular products does not describe nor teach calculating for each customer at least one of an expected income from the customer for the dealer and a timing of purchase of a product from the dealer based on the predicted future customer behavior, and providing financing by the lender for the dealer as part of the offer to targeted customers, wherein the lender provides financing to the targeted customers that purchase a product from the dealer as a result of the customer campaigns.

Accordingly, for at least the reasons set forth above, Claim 1 is submitted to be patentable over Walter.

Claims 6-10 depend, directly or indirectly, from independent Claim 1 which is submitted to be in condition for allowance. When the recitations of Claims 6-10 are considered in combination with the recitations of Claim 1, Applicants submit that dependent Claims 6-10 are also patentable over Walter.

Claim 11 recites a system for managing customer relationships between customers, a dealer, and a lender, wherein the dealer offers products for sale to the customers and the lender is engaged in a business of providing financing, wherein the system comprises "at least one computer...a server including a database of customer information, customer spending data, and customer financial data for each customer stored within the database, wherein the financial data includes at least one of income, loan and credit payment history, and loan and credit overpayments for each customer, said server configured to...predict future customer behavior for each customer stored in the database based on the customer information, customer spending data, and customer financial data...calculate for each

customer at least one of an expected income from the customer for the dealer and a timing of purchase of a product from the dealer based on the predicted future customer behavior...generate a list of targeted customers based on the calculated expected income and the calculated timing of purchase, wherein a targeted customer is a customer designated for receiving from the dealer a personalized offer for sale of a product...construct customer campaigns with personalized offers for the targeted customers...determine that financing is to be provided by the lender for the dealer as part of the offer to the targeted customers, wherein the lender provides financing to the targeted customers that purchase a product from the dealer as a result of the customer campaigns...a network connecting said server to said computer.”

Claim 11, as herein amended, recites a system configured for managing customer relationships, wherein the system comprises a server configured to perform steps essentially similar to those recited in Claim 1. Thus, it is submitted that Claim 11 is patentable over Walter for reasons that correspond to those given with respect to Claim 1.

Claims 16-21 depend, directly or indirectly, from independent Claim 11 which is submitted to be in condition for allowance. When the recitations of Claims 16-21 are considered in combination with the recitations of Claim 11, Applicants submit that dependent Claims 16-21 are also patentable over Walter.

Claim 22 recites a computer-readable medium for managing customer relationships between customers, a dealer, and a lender, wherein the dealer offers products for sale to the customers and the lender is engaged in a business of providing financing, the computer readable medium comprising “at least one record of customer information, customer spending data, and customer financial data for each customer, wherein the financial data includes at least one of income, loan and credit payment history, and loan and credit overpayments for each customer...a record of key performance indicators...a plurality of rules for matching customer information, customer spending data, and customer financial data to at least one of said key performance indicators...a record of predictions of future customer behavior for each customer according to said plurality of rules...a plurality of rules for calculating for each customer of at least one of an expected income from the customer for the dealer and a timing of purchase of a product from the dealer based on the predictions of future customer behavior...a list of targeted customers based on the calculated income and

the calculated timing of purchase, wherein a targeted customer is a customer designated for receiving from the dealer a personalized offer for sale of a product...a plurality of rules for constructing a customer campaign with personalized offers for the targeted customers...a plurality of rules for determining that financing is to be provided by the lender for the dealer as part of the offer to the targeted customers, wherein the lender provides financing to the targeted customers that purchase a product from the dealer as a result of the customer campaigns.”

Claim 22, as herein amended, recites a computer-readable medium, wherein the a computer-readable medium comprises a code segment configured to perform steps essentially similar to those recited in Claim 1. Thus, it is submitted that Claim 22 is patentable over Walter for reasons that correspond to those given with respect to Claim 1.

Claims 23-26 depend, directly or indirectly, from independent Claim 22 which is submitted to be in condition for allowance. When the recitations of Claims 23-26 are considered in combination with the recitations of Claim 22, Applicants submit that dependent Claims 23-26 are also patentable over Walter.

Claim 27 recites a computer for managing a customer relationship between customers, a dealer, and a lender, wherein the dealer offers products for sale to the customers and the lender is engaged in a business of providing financing, wherein the computer is programmed to “prompt a user to select a database of available customer information, customer spending data, and customer financial data for each customer for analysis, wherein the financial data includes at least one of income, loan and credit payment history, and loan and credit overpayments for each customer...predict future customer behavior based upon customer information, customer spending data, and customer financial data...calculate for each customer at least one of an expected income from the customer for the dealer and a timing of purchase of a product from the dealer based on the predicted future customer behavior...generate a list of targeted customers based on the calculated expected income and the calculated timing of purchase, wherein the targeted customer is a customer designated for receiving from the dealer a personalized offer for sale of a product...prompt a user with a strategy to manage the customer relationship with personalized offers for customers based upon predicted future behavior...determine that financing is to be provided by the lender for the dealer as part of the offer to the targeted customers, wherein the lender provides financing

to the targeted customers that purchase a product from the dealer as a result of the strategy to manage the customer relationship.”

Claim 27, as herein amended, recites a computer programmed to perform steps essentially similar to those recited in Claim 1. Thus, it is submitted that Claim 27 is patentable over Walter for reasons that correspond to those given with respect to Claim 1.

Claims 28-30 depend, directly or indirectly, from independent Claim 27 which is submitted to be in condition for allowance. When the recitations of Claims 28-30 are considered in combination with the recitations of Claim 27, Applicants submit that dependent Claims 28-30 are also patentable over Walter.

Claim 31 recites a method for managing a customer relationship between customers, a dealer, and a lender, wherein the dealer offers products for sale to the customers and the lender is engaged in a business of providing financing, wherein the method comprises the steps of “selecting, from an electronic interface, a record of customer information, customer spending data, and customer financial data for each customer, wherein the financial data includes at least one of income, loan and credit payment history, and loan and credit overpayments for each customer...selecting, from the electronic interface, key performance indicators for an analysis of the customer information, customer spending data, and customer financial data...requesting, from the electronic interface, a prediction of future customer behavior for each customer...requesting, from the electronic interface, a calculation for each customer of at least one of an expected income from the customer for the dealer and a timing of purchase of a product from the dealer based on the predicted future customer behavior...request, from the electronic interface, a list of targeted customers based on the calculated income and the calculated timing of purchase, wherein the targeted customer is a customer designated for receiving from the dealer a personalized offer for sale of a product...request, from the electronic interface, a construction of customer campaigns with personalized offers for the targeted customers...request, from the electronic interface, a determination of financing that is to be provided by the lender for the dealer as part of the offer to the targeted customers, wherein the lender provides financing to the targeted customers that purchase a product from the dealer as a result of the customer campaigns.”

Claim 31, as herein amended, recites a method for managing a customer relationship, wherein the method comprises steps essentially similar to those recited in Claim 1. Thus, it is

submitted that Claim 31 is patentable over Walter for reasons that correspond to those given with respect to Claim 1.

Claims 32-34 depend, directly or indirectly, from independent Claim 31 which is submitted to be in condition for allowance. When the recitations of Claims 32-34 are considered in combination with the recitations of Claim 31, Applicants submit that dependent Claims 32-34 are also patentable over Walter.

Claim 35 recites apparatus for managing customer relationships between customers, a dealer, and a lender, wherein the dealer offers products for sale to the customers and the lender is engaged in the business of providing financing, wherein the apparatus comprises “means for storing customer information, customer spending data, and customer financial data for each customer, wherein the financial data includes at least one of income, loan and credit payment history, and loan and credit overpayments for each customer...means for predicting future customer behavior according to the customer information, customer spending data, and customer financial data...means for calculating for each customer at least one of an expected income from the customer for the dealer and a timing of purchase of a product from the dealer based on the predicted future customer behavior...means for generating a list of targeted customers based on the calculated income and the calculated timing of purchase, wherein a targeted customer is a customer designated for receiving from the dealer a personalized offer for sale of a product...means for constructing customer campaigns to manage the customer relationship...means for determining that financing is to be provided by the lender for the dealer as part of the offer to the targeted customer, wherein the lender provides financing to the targeted customers that purchase a product from the dealer as a result of the customer campaigns.”

Claim 35, as herein amended, recites an apparatus configured to perform steps essentially similar to those recited in Claim 1. Thus, it is submitted that Claim 35 is patentable over Walter for reasons that correspond to those given with respect to Claim 1.

Claims 36-42 depend, directly or indirectly, from independent Claim 35 which is submitted to be in condition for allowance. When the recitations of Claims 36-42 are considered in combination with the recitations of Claim 35, Applicants submit that dependent Claims 36-42 are also patentable over Walter.

Claim 43 recites a database for managing customer relationships between customers, a dealer, and a lender, wherein the dealer offers products for sale to the customers and the lender is engaged in the business of providing financing, wherein the database comprises “data corresponding to customer information, customer spending data, and customer financial data for each customer, wherein the financial data includes at least one of income, loan and credit payment history, and loan and credit overpayments for each customer...data corresponding to key performance indicators...data corresponding to rules for matching customer information, customer spending data, and customer financial data to at least one of the key performance indicators...data corresponding to predictions of future customer behavior based on the rules...data corresponding to rules for calculating for each customer at least one of an expected income from the customer for the dealer and a timing of purchase of a product from the dealer based on the predicted future customer behavior...data corresponding to rules for generating a list of targeted customers based on the calculated income and the calculated timing of purchase, wherein a targeted customer is a customer designated for receiving from the dealer a personalized offer for sale of a product...data corresponding to rules for constructing customer campaigns to manage the customer relationship...data corresponding to rules for determining that financing is to be provided by the lender for the dealer as part of the offer to the targeted customer, wherein the lender provides financing to the targeted customers that purchase a product from the dealer as a result of the customer campaigns.”

Claim 43, as herein amended, recites a database including data, essentially similar to the data recited in Claim 1. Thus, it is submitted that Claim 43 is patentable over Walter for reasons that correspond to those given with respect to Claim 1.

Claims 44-47 depend, directly or indirectly, from independent Claim 43 which is submitted to be in condition for allowance. When the recitations of Claims 44-47 are considered in combination with the recitations of Claim 43, Applicants submit that dependent Claims 44-47 are also patentable over Walter.

Claim 48 recites a computer program embodied on a computer readable medium for managing customer relationships between customers, a dealer, and a lender, using a network based system including a server system coupled to a centralized database and at least one client system, wherein the dealer offers products for sale to the customers and the lender is

engaged in a business of providing financing, wherein the computer program comprises “a code segment that receives customer data for each customer into a centralized customer database, wherein the customer data includes at least one of income, loan and credit payment history, and loan and credit overpayments for each customer...a code segment that accesses the centralized customer database...a code segment that predicts future customer behavior based on information available from the customer database...a code segment that calculates for each customer at least one of an expected income from the customer for the dealer and a timing of purchase of a product from the dealer based on the predicted future customer behavior...a code segment that generates a list of targeted customers based on the calculated income and the calculated timing of purchase, wherein a targeted customer is a customer designated for receiving from the dealer a personalized offer for sale of a product...a code segment that develops customer campaigns with personalized offers for the targeted customers...a code segment that determines whether financing is to be provided by the lender for the dealer as part of the offer to the targeted customer, wherein the lender provides financing to the targeted customers that purchase a product from the dealer as a result of the customer campaigns.”

Claim 48, as herein amended, recites a computer program including a code segment configured to perform steps essentially similar to those recited in Claim 1. Thus, it is submitted that Claim 48 is patentable over Walter for reasons that correspond to those given with respect to Claim 1.

Claims 49-60 depend, directly or indirectly, from independent Claim 48 which is submitted to be in condition for allowance. When the recitations of Claims 49-60 are considered in combination with the recitations of Claim 48, Applicants submit that dependent Claims 49-60 are also patentable over Walter.

Claim 61 recites a database for managing customer relationships between customers, a dealer, and a lender, wherein the dealer offers products for sale to the customers and the lender is engaged in the business of providing financing, wherein the database comprises “data corresponding to customer information, customer spending, and customer finances, wherein the data corresponding to customer finances includes at least one of income, loan and credit payment history, and loan and credit overpayments...data corresponding to key performance indicators...at least one rule to be applied to the customer information, customer

spending data, and customer finance data and the key performance indicator data to predict future customer behavior...at least one rule for calculating for each customer at least one of an expected income from the customer for the dealer and a timing of purchase of a product from the dealer based on the predicted future customer behavior...at least one rule for generating a list of targeted customers based on the calculated income and the calculated timing of purchase, wherein a targeted customer is a customer designated for receiving from the dealer a personalized offer for sale of a product...at least one rule for constructing customer campaigns to manage the customer relationship...at least one rule for determining that financing is to be provided by the lender for the dealer as part of the offer to the targeted customer, wherein the lender provides financing to the targeted customers that purchase a product from the dealer as a result of the customer campaigns.”

Claim 61, as herein amended, recites a database comprising data essentially similar to the data recited in Claim 1. Thus, it is submitted that Claim 61 is patentable over Walter for reasons that correspond to those given with respect to Claim 1.

Claims 62-64 depend, directly or indirectly, from independent Claim 61 which is submitted to be in condition for allowance. When the recitations of Claims 62-64 are considered in combination with the recitations of Claim 61, Applicants submit that dependent Claims 62-64 are also patentable over Walter.

Accordingly, for at least the reasons set forth above, Applicants respectfully request that the Section 102 rejection of Claims 1, 6-11, and 16-65 be withdrawn.

The rejection of Claims 2-5 and 12-15 under 35 U.S.C. § 103(a) as being unpatentable over Walter is respectfully traversed.

Walter is described hereinabove.

According to the Office Action, the Examiner takes Official Notice of “the Hit and Run and Dormancy models [as] being obvious extensions to Walter’s market analysis to provide market campaigns that can be targeted to specific customers.”

Applicants respectfully traverse the Official Notice. Official Notice may be used for “facts...capable of such instant and unquestionable demonstration as to defy dispute”. (See *In re Ahlert*, 424 F.2d 1088, 165 USPQ 418, 420 (CCPA 1970). Applicants submit that the

Official Notice provided in the Office Action does not include facts that are capable of instant and unquestionable demonstration as to defy dispute. More specifically, Applicants submit that the assertion that “the Hit and Run and Dormancy models [are] obvious extensions to Walter’s market analysis to provide market campaigns that can be targeted to specific customers” is not a fact that is capable of instant and unquestionable demonstration as to defy dispute. Accordingly, Applicants submit that the Official Notice taken in the Office Action is improper.

Claims 2-5 depend from independent Claim 1, which is recited above.

As stated above, Walter does not describe nor suggest a method for managing customer relationships as recited in Claim 1. Accordingly, for at least the reasons set forth above, Claim 1 is submitted to be patentable over Walter.

Claims 2-5 depend, directly or indirectly, from independent Claim 1 which is submitted to be in condition for allowance. When the recitations of Claims 2-5 are considered in combination with the recitations of Claim 1, Applicants submit that dependent Claims 2-5 are also patentable over Walter.

Claim 12-15 depend from independent Claim 11, which is recited above.

As stated above, Walter does not describe nor suggest a system configured for managing customer relationships as recited in Claim 11. Accordingly, for at least the reasons set forth above, Claim 11 is submitted to be patentable over Walter.

Claims 12-15 depend, directly or indirectly, from independent Claim 11 which is submitted to be in condition for allowance. When the recitations of Claims 12-15 are considered in combination with the recitations of Claim 11, Applicants submit that dependent Claims 12-15 are also patentable over Walter.

Accordingly, for at least the reasons set forth above, Applicants respectfully request that the Section 103 rejection of Claims 2-5 and 12-15 be withdrawn.

In view of the foregoing amendments and remarks, all the claims now active in this application are believed to be in condition for allowance. Reconsideration and favorable action is respectfully solicited.

Respectfully Submitted,



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